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*Attorneys for Plaintiff, CHANEL, INC.*

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

|                                |   |                                    |
|--------------------------------|---|------------------------------------|
| CHANEL, INC.,                  | ) | Case No. 2:11-cv-01508-KJD-PAL     |
|                                | ) |                                    |
| Plaintiff,                     | ) |                                    |
|                                | ) |                                    |
| v.                             | ) | <b>[PROPOSED] ORDER GRANTING</b>   |
|                                | ) | <b>PLAINTIFF'S <i>EX PARTE</i></b> |
|                                | ) | <b>APPLICATION FOR ENTRY OF</b>    |
| THE PARTNERSHIPS and           | ) | <b>TEMPORARY RESTRAINING ORDER</b> |
| UNINCORPORATED ASSOCIATIONS    | ) | <b>AND PRELIMINARY INJUNCTION</b>  |
| IDENTIFIED ON SCHEDULE "A" and | ) |                                    |
| DOES 1-1000,                   | ) |                                    |
|                                | ) |                                    |
| Defendants.                    | ) |                                    |

THIS CAUSE is before the Court on Plaintiff's *Ex Parte* Application For Entry of a Temporary Restraining Order and Preliminary Injunction (the "Application for TRO"). Plaintiff, Chanel, Inc. ("Plaintiff" or "Chanel"), moves, on an *ex parte* basis, for entry of a temporary restraining order, and, upon expiration of the temporary restraining order, a preliminary injunction

against Defendants, the Partnerships and Unincorporated Associations identified on Schedule “A” attached hereto (the “Defendants”), pursuant to 15 U.S.C. § 1116 and Fed. R. Civ. P. 65 for alleged violations of the Lanham Act, 15 U.S.C. §§ 1114, and 1125(a) and (d).

For reasons set forth herein, Plaintiff’s Application for TRO is GRANTED.





### I. Factual Background





The Court bases this Temporary Restraining Order on the following facts from Plaintiff’s Complaint, Application for TRO, and supporting evidentiary submissions.


Chanel is a corporation duly organized under the laws of the State of New York with its principal place of business in the United States located at Nine West 57th Street, New York, New York 10019. (Compl. ¶ 3.) Chanel operates boutiques throughout the world, including within this Judicial District. See id. Chanel is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this Judicial District, a variety of high quality luxury goods. (Declaration of Adrienne Hahn Sisbarro in Support of Plaintiff’s *Ex Parte* Application for TRO [“Hahn Decl.”] ¶ 5.)

Chanel is, and at all times relevant hereto has been, the owner of all rights in and to the following trademarks:

| Trademark | Registration Number | Registration Date  | Class(es)/Goods                             |
|-----------|---------------------|--------------------|---|
| CHANEL    | 0,612,169           | September 13, 1955 | IC 014 - Necklaces                          |
| CHANEL    | 0,626,035           | May 1, 1956        | IC 018 – Women’s Handbags                   |
| CHANEL    | 0,902,190           | November 10, 1970  | IC 014 - Bracelets, Pins, and Earrings      |
| CHANEL    | 0,906,262           | January 19, 1971   | IC 025 - Coats, Suits, Blouses, and Scarves |

|    |   |           |                     |  |
|----|---|-----------|---------------------|--|
| 1  | CHANEL  | 0,915,139 | June 15, 1971       | IC 025 - Women's Shoes   |
| 2  |   |           |                     |  |
| 3  | CHANEL  | 0,955,074 | March 13,<br>1973   | IC 014 – Watches   |
| 4  |   |           |                     |  |
| 5  |              | 1,241,264 | June 7, 1983        | IC 025 - Suits, Jackets, Skirts, Dresses,<br>Pants, Blouses, Tunics, Sweaters,<br>Cardigans, Tee-Shirts, [Capes,] Coats,<br>Raincoats, [Jackets Made of Feathers,<br>Shawls,] Scarves, Shoes and Boots   |
| 6  |   |           |                     |  |
| 7  |   |           |                     |  |
| 8  | CHANEL  | 1,241,265 | June 7, 1983        | IC 025 - Suits, Jackets, Skirts, Dresses,<br>Pants, Blouses, Tunics, Sweaters,<br>Cardigans, [Tee-Shirts, Capes,] Coats,<br>Raincoats, [Jackets Made of Feathers,<br>Shawls,] Scarves, Shoes and Boots   |
| 9  |   |           |                     |  |
| 10 |   |           |                     |  |
| 11 |   |           |                     |  |
| 12 |              | 1,271,876 | March 27,<br>1984   | IC 025 - Clothing-Namely, Coats,<br>Dresses, Blouses, Raincoats, Suits,<br>Skirts, Cardigans, Sweaters, Pants,<br>Jackets, Blazers, [Shawls, Hats] and<br>Shoes  |
| 13 |   |           |                     |  |
| 14 |   |           |                     |  |
| 15 |            | 1,314,511 | January 15,<br>1985 | IC 018 - Leather Goods-Namely,<br>Handbags, [Wallets, Travel Bags,<br>Luggage, Credit Card And Business<br>Card Cases, Make-Up Bags and<br>Vanity Cases Sold Empty, Briefcase-<br>Type Portfolios; Attache Cases,<br>Change Purses, Suitcases, Tote Bags,<br>Garment Bags and Travellers' Shoe<br>Bags]      |
| 16 |   |           |                     |  |
| 17 |   |           |                     |  |
| 18 |   |           |                     |  |
| 19 |   |           |                     |  |
| 20 | CHANEL<br> | 1,329,750 | April 9, 1985       | IC 025 - Blouses, Skirts, Sweaters,<br>Cardigans, Dresses [Shawls, Scarves,<br>Hats, Collars, Cuffs and Neckties]  |
| 21 |   |           |                     |  |
| 22 |   |           |                     |  |
| 23 | CHANEL  | 1,347,677 | July 9, 1985        | IC 018 - Leather Goods-namely,<br>Handbags [Wallets, Travel Bags,<br>Luggage, Business and Credit Card<br>Cases, Brief Case Type Portfolios,<br>Attache Cases, Change Purses,<br>Suitcases, Tote Bags, Make-Up Bags<br>and Vanity Cases Sold Empty,<br>Garment Bags for Travel and<br>Travellers' Shoe Bags] |
| 24 |   |           |                     |  |
| 25 |   |           |                     |  |
| 26 |   |           |                     |  |
| 27 |   |           |                     |  |
| 28 |   |           |                     |  |

|    |   |           |   |
|----|---|-----------|---|
| 1  |   |           | IC 006 - Keychains  |
| 2  |   |           | IC 014 - Costume Jewelry  |
| 3  |    | 1,501,898 | August 30,<br>1988  |
| 4  |   |           | IC 016 - Gift Wrapping Paper  |
| 5  |   |           | IC 025 -Blouses, Shoes, Belts,<br>Scarves, Jackets, Men's Ties  |
| 6  |   |           | IC 026 – Brooches and Buttons for<br>Clothing   |
| 7  | CHANEL  | 1,510,757 | November 1,<br>1988   |
| 8  |   |           | IC 009 - Sunglasses   |
| 9  |    | 1,654,252 | August 20,<br>1991  |
| 10 |   |           | IC 009 - Sunglasses   |
| 11 |   |           |   |
| 12 | CHANEL  | 1,733,051 | November 17,<br>1992  |
| 13 |   |           | IC 018 - Leather Goods; namely,<br>Handbags, Wallets, Travel Bags,<br>Luggage, Business and Credit Card<br>Cases, Change Purses, Tote Bags,<br>Cosmetic Bags Sold Empty, and<br>Garment Bags for Travel |
| 14 |   |           |   |
| 15 |  | 1,734,822 | November 24,<br>1992  |
| 16 |   |           | IC 018 - Leather Goods; namely,<br>Handbags, Wallets, Travel Bags,<br>Luggage, Business Card Cases,<br>Change Purses, Tote Bags, and<br>Cosmetic Bags Sold Empty  |
| 17 |   |           |   |
| 18 | J12   | 2,559,772 | April 9, 2002   |
| 19 |   |           | IC 014 -Timepieces; namely, Watches,<br>and Parts Thereof   |
| 20 |   |           |   |
| 21 |  | 3,022,708 | December 6,<br>2005   |
| 22 |   |           | IC 006 - Key Chains   |
| 23 |   |           | IC 009 -Ski Goggles, Sunglasses   |
| 24 |   |           | IC 018 -Luggage, Handbags, Totes,<br>Backpacks, Travel Bags, All-Purpose<br>Carrying Bags, Umbrellas  |
| 25 |   |           | IC 025 - Boots, Coats, Jackets, Gloves,<br>Hats, Pants, Sandals, Scarves, Shirts,<br>Shoes, Ski Boots, Sun Visors,<br>Suspenders, Sweatbands, Swimwear  |
| 26 |   |           |   |
| 27 |   |           |   |
| 28 |   |           |   |

|   |           |                   |   |
|---|-----------|-------------------|---|
|   |           |                   | IC 028 - Bags Specially Adopted For Sports Equipment, Basketballs, Kites, Skis, Ski Polls, Tennis Rackets, Tennis Balls, Tennis Racket Covers, Golf Clubs, Golf Bags, and Snow Boards |
|  | 3,025,934 | December 13, 2005 | IC 018 – Handbags   |
|  | 3,025,936 | December 13, 2005 | IC 009 -Mobile Phone Straps, Eyeglass Frames, Sunglasses<br>IC 025 - Gloves, Swimwear<br>IC 026 - Hair Accessories Namely Barrettes And Pony-Tail Holders                             |
| CHANEL  | 3,133,139 | August 22, 2006   | IC 014 - Jewelry And Watches  |

(the “Chanel Marks”) which are registered on the Principal Register of the United States Patent and Trademark Office and are used in connection with the manufacture and distribution of high quality goods in the categories identified above. (Hahn Decl. ¶ 4; see also United States Trademark Registrations of the Chanel Marks at issue [“Chanel Trademark Registrations”] attached as Exhibit A to the Hahn Decl.).

The Defendants have advertised, offered for sale, and/or sold, at least, handbags, wallets, shoes, boots, sunglasses, scarves, tee shirts, watches, and costume jewelry, including necklaces, bracelets, earrings, brooches, and rings, bearing what Plaintiff has determined to be counterfeits, infringements, reproductions, and/or colorable imitations of the Chanel Marks. Although each of the Defendants may not copy and infringe each Chanel Mark for each category of goods protected, Chanel has submitted sufficient evidence showing each Defendant has infringed, at least, one or more of the Chanel Marks. (Hahn Decl. ¶¶ 11-15; Declaration of Brandon Tanori in Support of Plaintiff’s *Ex Parte* Application for Entry of Temporary Restraining Order and Preliminary Injunction [“Tanori Decl.”] ¶ 4.) The Defendants are not now, nor have they ever been, authorized or licensed to use, reproduce, or make counterfeits, infringements, reproductions, and/or colorable imitations of the Chanel Marks. (Hahn Decl. ¶ 9.)

1 Plaintiff's counsel retained Brandon Tanori ("Tanori") of Investigative Consultants, a  
2 licensed private investigative firm, to investigate suspected sales of counterfeit Chanel branded  
3 products by the Defendants. (Hahn Decl. ¶ 10; Tanori Decl. ¶ 3.) Between August 25, 2011 and  
4 September 1, 2011, Tanori accessed the Internet websites operating under the ten of the domain  
5 names at issue in this action, chanelbagsnow.com, co-cochanel.com, chanel-j12.org,  
6 cheapshoes169.com, luxurychanelgifts.com, voguechanel.com, replicachanelonline.com,  
7 hahaclothing.com, topbrandbag.net, and fashioncheapjewelry.com, placed orders for the purchase of  
8 various Chanel branded products, including two handbags, one wallet, one watch, one pair of shoes,  
9 one scarf, one pair of earrings, one pair of sunglasses, one tee shirt, and one necklace, and requested  
10 each product purchased be shipped to his address in Las Vegas, Nevada. (Tanori Decl. ¶ 4 and  
11 Composite Exhibit A attached thereto.) Tanori's purchases were processed entirely online, which  
12 included providing shipping and billing information, payment, and confirmation of his orders.  
13 (Tanori Decl. ¶ 4 and Composite Exhibit A attached thereto.)

14 Thereafter, a representative of Chanel, Adrienne Hahn Sisbarro, reviewed and visually  
15 inspected the web page listings, including images, for each of the Chanel branded goods purchased  
16 by Tanori and determined the items were non-genuine Chanel products. (Hahn Decl. ¶¶ 11-12, 15.)  
17 Additionally, Hahn reviewed and visually inspected the items bearing the Chanel Marks offered for  
18 sale via the Internet websites operating under the partnership and/or unincorporated association  
19 names identified on Schedule "A" hereto (the "Subject Domain Names") and determined the  
20 products were non-genuine Chanel products. (Hahn Decl. ¶ 13-15 and Composite Exhibits B and C  
21 attached thereto, relevant web page captures from the Defendants' Internet websites operating under  
22 the Subject Domain Names displaying the Chanel branded items offered for sale.)

## 23 II. Conclusions of Law

24 The declarations Plaintiff submitted in support of its Application for TRO support the  
25 following conclusions of law:

26 A. Plaintiff has a very strong probability of proving at trial that consumers are likely to  
27 be confused by the Defendants' advertisement, promotion, sale, offer for sale, and/or distribution of  
28



1 handbags, wallets, shoes, boots, sunglasses, scarves, tee shirts, watches, and costume jewelry,  
2 including necklaces, bracelets, earrings, brooches, and rings bearing counterfeits, infringements,  
3 reproductions, and/or colorable imitations of the Chanel Marks, and that the products the Defendants  
4 are selling are copies of Plaintiff's products that bear marks which are substantially indistinguishable  
5 from and/or colorful imitations of the Chanel Marks on handbags, wallets, shoes, boots, sunglasses,  
6 scarves, tee shirts, watches, and costume jewelry, including necklaces, bracelets, earrings, brooches,  
7 and rings. Because of the infringement of the Chanel Marks, Plaintiff is likely to suffer immediate  
8 and irreparable injury if a temporary restraining order is not granted. It clearly appears from the  
9 following specific facts, as set forth in Plaintiff's Complaint, Plaintiff's Application for TRO, and  
10 accompanying declarations on file, that immediate and irreparable loss, damage, and injury will  
11 result to Plaintiff and to consumers before the Defendants can be heard in opposition unless  
12 Plaintiff's request for *ex parte* relief is granted:

13           1.       The Defendants own or control Internet business operations which advertise,  
14 promote, offer for sale, and sell, at least, handbags, wallets, shoes, boots, sunglasses, scarves, tee  
15 shirts, watches, and costume jewelry, including necklaces, bracelets, earrings, brooches, and rings  
16 bearing counterfeit and infringing trademarks in violation of Plaintiff's rights;

17           2.       There is good cause to believe that more counterfeit and infringing handbags,  
18 wallets, shoes, boots, sunglasses, scarves, tee shirts, watches, and costume jewelry, including  
19 necklaces, bracelets, earrings, brooches, and rings bearing Plaintiff's trademarks will appear in the  
20 marketplace; that consumers may be misled, confused, and disappointed by the quality of these  
21 products; and that Plaintiff may suffer loss of sales for its genuine products;

22           3.       There is good cause to believe that if Plaintiff proceeds with normal advance  
23 notice to the Defendants on this Application for TRO, the Defendants can easily and quickly transfer  
24 the registrations for many of the Subject Domain Names, or modify registration data and content,  
25 change hosts, and redirect traffic to other websites, thereby thwarting Plaintiff's ability to obtain  
26 meaningful relief;





1           (2)     The Defendants, their officers, directors, employees, agents, subsidiaries, distributors,  
2 and all persons in active concert or participation with the Defendants having notice of this  
3 Temporary Restraining Order shall immediately discontinue the use of the Chanel Marks or any  
4 confusingly similar trademarks, on or in connection with all Internet websites owned and operated,  
5 or controlled by them including the Internet websites operating under the Subject Domain Names;

6           (3)     The Defendants, their officers, directors, employees, agents, subsidiaries, distributors,  
7 and all persons in active concert or participation with the Defendants having notice of this  
8 Temporary Restraining Order shall immediately discontinue the use of the Chanel Marks, or any  
9 confusingly similar trademarks within domain name extensions, metatags or other markers within  
10 website source code, from use on any webpage (including as the title of any web page), any  
11 advertising links to other websites, from search engines' databases or cache memory, and any other  
12 form of use of such terms which is visible to a computer user or serves to direct computer searches  
13 to websites registered by, owned, or operated by the Defendants, including the Internet websites  
14 operating under the Subject Domain Names;

15           (4)     The Defendants shall not transfer ownership of the Subject Domain Names during the  
16 pendency of this Action, or until further Order of the Court;

17           (5)     The domain name Registrars for the Subject Domain Names are directed to transfer to  
18 Plaintiff's counsel, for deposit with this Court, domain name certificates for the Subject Domain  
19 Names;

20           (6)     Upon entry of this Order, Plaintiff shall provide a copy of the Order by email to the  
21 registrar of record for each of the Subject Domain Names, so that the registrar of record of each of  
22 the Subject Domain Names may, in turn, notify each registrant of the Order and provide notice of the  
23 locking of the domain name to the registrant of record. After providing such notice to the registrars  
24 so the domain names may be locked, Plaintiff shall also provide notice and a copy of this Order to  
25 the registrant of each Subject Domain Name via email to the email address provided as part of the  
26 domain registration data for each of the Subject Domain Names identified in Composite Exhibit C to  
27 the Declaration of Stephen M. Gaffigan in Support of the Application for TRO. If an email address  
28

1 was not provided as part of the domain registration data for a Subject Domain Name, Plaintiff shall  
2 provide notice and a copy of this Order to the operators of the Internet websites via the email  
3 addresses provided on the Internet websites operating under such Subject Domain Names as  
4 identified in Composite Exhibit C to the Declaration of Stephen M. Gaffigan in Support of the  
5 Application for TRO. After forty-eight (48) hours have elapsed after provision of this Order to the  
6 registrars of record and the registrants, Plaintiff shall provide a copy of this Order to the registries for  
7 the Subject Domain Names for the purposes described in Paragraph 7 *infra*.

8 (7) The top-level domain (TLD) Registries for the Subject Domain Names, within ten  
9 (10) days of receipt of this Temporary Restraining Order shall change the registrar of record for the  
10 Subject Domain Names, excepting any such domain names which such Registries have been notified  
11 in writing by the Plaintiff have been or will be dismissed from this action, to a holding account with  
12 the United States based Registrar, GoDaddy.com, Inc. Upon the change of the registrar of record for  
13 the Subject Domain Names to the holding account, GoDaddy.com, Inc. will hold access to the  
14 Subject Domain Names in trust for the Court during the pendency of this action. Additionally,  
15 GoDaddy.com, Inc. shall immediately update the Domain Name System ("DNS") data it maintains  
16 for the Subject Domain Names, which link the domain names to the IP addresses where their  
17 associated websites are hosted, to NS1.MEDIATEMPLE.NET and NS2.MEDIATEMPLE.NET,  
18 which will cause the domain names to resolve to the website where a copy of the Complaint,  
19 Summonses, Temporary Restraining Order, and all other documents on file in this action are  
20 displayed. Alternatively, GoDaddy.com, Inc. may institute a domain name forwarding which will  
21 automatically redirect any visitor to the Subject Domain Names to the following Uniform Resource  
22 Locator ("URL") <http://servingnotice.com/sdv/index.html> whereon copies of the Complaint,  
23 Summonses, Temporary Restraining Order, and all other documents on file in this action are  
24 displayed. After GoDaddy.com, Inc. has effected this change the Subject Domain Names shall be  
25 placed on Lock status, preventing the modification or deletion of the domains by the registrar or the  
26 Defendants;

1 (8) Plaintiff may enter the Subject Domain Names into Google's Webmaster Tools and  
2 cancel any redirection of the domains that have been entered there by the Defendants which redirect  
3 traffic to the counterfeit operations to a new domain name and thereby evade the provisions of this  
4 Temporary Restraining Order;

5 (9) The Defendants shall preserve copies of all their computer files relating to the use of  
6 any of the Subject Domain Names and shall take all steps necessary to retrieve computer files  
7 relating to the use of the Subject Domain Names and that may have been deleted before the entry of  
8 this Temporary Restraining Order;

9 (10) This Temporary Restraining Order shall remain in effect until the date for the hearing  
10 on the Motion for Preliminary Injunction set forth below, or until such further dates as set by the  
11 Court or stipulated to by the parties;

12 (11) This Temporary Restraining Order shall apply to the Subject Domain Names and any  
13 other domain names properly brought to the Court's attention and verified by sworn affidavit which  
14 verifies such new domain names are being used by Defendants for the purpose of counterfeiting the  
15 Chanel Marks at issue in this action and/or unfairly competing with Chanel in connection with  
16 search engine results pages;

17 **BOND TO BE POSTED**

18 (12) Pursuant to 15 U.S.C. § 1116(d)(5)(D), Plaintiff shall post a bond in the amount of  
19 Twenty Thousand Dollars and Zero Cents (\$20,000.00), as payment of damages to which  
20 Defendants may be entitled for a wrongful injunction or restraint. Plaintiff shall post the bond prior  
21 to requesting the registries change to the registrar of record for the Subject Domain Names to a  
22 holding account with GoDaddy.com, Inc.

23 **PRELIMINARY INJUNCTION**

24 (13) A hearing is set before this Court in the United States Courthouse located 333 S. Las  
25 Vegas Blvd, Las Vegas, Nevada 89101, Courtroom 6D, on \_\_\_\_\_, 2011, at \_\_\_\_\_,  
26 or at such other time that this Court deems appropriate, on Plaintiff's Motion for a Preliminary  
27 Injunction restraining the Defendants, their officers, directors, employees, agents, subsidiaries,  
28


1 distributors, and all persons in active concert or participation with the Defendants from engaging in  
2 the activities that are subject of the above Temporary Restraining Order;

3 (14) Plaintiff shall serve copies of the Complaint, Application for TRO and this  
4 Temporary Restraining Order and all other pleadings and documents on file in this action on all the  
5 Defendants by email as described above and by posting copies of the Application for TRO and this  
6 Temporary Restraining Order on the website located at <http://servingnotice.com/sdv/index.html>  
7 within forty-eight (48) hours of control of the Subject Domain Names being changed to the Court via  
8 the GoDaddy.com, Inc. holding account, and such notice so given shall be deemed good and  
9 sufficient service thereof. Plaintiff shall continue to provide notice of these proceedings and copies  
10 of the documents on file in this matter to the Defendants by regularly updating the website located at  
11 <http://servingnotice.com/sdv/index.html> or by other means reasonably calculated to give notice  
12 which is permitted by the Court. Any response or opposition to Plaintiff's Motion for Preliminary  
13 Injunction must be filed and served on Plaintiff's counsel prior to the hearing set for \* see below, 2011,  
14 2011, and filed with the Court, along with Proof of Service, on \* see below, 2011. Plaintiff  
15 shall file any Reply Memorandum on or before \* see below, 2011. The above dates may be  
16 revised upon stipulation by all parties and approval of this Court. The Defendants are hereby on  
17 notice that failure to appear at the hearing may result in the imposition of a preliminary injunction  
18 against them pursuant to 15 U.S.C. § 1116(d) and Fed. R. Civ. P. 65.

19 \*\*Hearing is set for 10/11/2011 at 9:00 AM. Defendants to file a response by 10/4/2011.  
20 Plaintiff to file replies by 10/7/2011.

21 IT IS SO ORDERED.

22 DATED: September 26, 2011

  
\_\_\_\_\_  
Kent J. Dawson  
United States District Judge

**SCHEDULE A****DEFENDANTS BY SUBJECT DOMAIN NAMES AND DEFENDANT NUMBER**

|              |  |
|--------------|--|
| Defendant 1  | eukuk.com<br>ktiffany.com<br>a2o5.com*                             |
| Defendant 2  | canadatoryburch.net<br>toryburchcanada.net                         |
| Defendant 3  | chanelbagsnow.com<br>chanelbagsol.com<br>coachbagsol.com           |
| Defendant 4  | cheapbagsgarden.com<br>cheapbagssales.com                          |
| Defendant 5  | cheapsunglassesoutlet.org<br>designersunglassesoutlet.org          |
| Defendant 6  | clothes2supplier.net<br>store6.net                                 |
| Defendant 7  | co-bag.com<br>cobags.com   |
| Defendant 8  | dgshoestores.com<br>dgshoestores.net                               |
| Defendant 9  | fakeoakleysunglasses2u.com<br>shoessaleusa.com<br>towholesaler.com |
| Defendant 10 | heheebags.com<br>hehegbags.com<br>herebags.com                     |
| Defendant 11 | hotdiscountshoes.com<br>leletrade.com                              |
| Defendant 12 | bags-shoes-china.com<br>iofferb2b.com<br>kairystrade.com           |
| Defendant 13 | lady-store.net<br>lovecoachs.com                                   |
| Defendant 14 | louisvuittonhandbagsonsale.net<br>louisvuittonidea.com             |
| Defendant 15 | luxury-designerhandbags.net<br>outlet-designerhandbags.net         |
| Defendant 16 | lv06.com<br>lvshopping.com   |

|    |              |   |
|----|--------------|---|
| 1  | Defendant 17 | myhandbaghut.com<br>myskysshoes.com   |
| 2  | Defendant 18 | raybansunglasseshut.net<br>sunglassesoutletshop.net   |
| 3  | Defendant 19 | topwholesalefashion.com<br>topwholesalefashion.net  |
| 4  | Defendant 20 | cheap-handbags-edge.com<br>wholesalebrandhandbags.us<br>wholesalecheapjewelrys.com<br>wholesale-cheap-jewelrys.com<br>wholesalejewelrysmart.com |
| 5  | Defendant 21 | knockoffo.com<br>tpurses.com  |
| 6  | Defendant 22 | oakleysunglass-cheap.com<br>oakleysunglassesaaa.com<br>oakleysunglassestopsale.com  |
| 7  | Defendant 23 | highheeled-shoes.com<br>hulantrading.com<br>women-high-heels.com  |
| 8  | Defendant 24 | co-cochanel.com<br>sexybikinissunglass.com<br>womanhighheel.com   |
| 9  | Defendant 25 | mynike-shoe.com<br>chian-jmmc.com*<br>furnesstoolset.com*<br>gigglesandsunshine.com*  |
| 10 | Defendant 26 | ezshopchina.com<br>luxuryshoechina.com<br>urbanclothesmall.com  |
| 11 | Defendant 27 | hketa.net<br>watchsell.net  |
| 12 | Defendant 28 | lilykala21.com<br>maplem2010.com  |
| 13 | Defendant 29 | puretimeshop.com<br>blog4rolex.com*   |
| 14 | Defendant 30 | ideal-replica.com<br>popselling.com   |
| 15 | Defendant 31 | eb67.com<br>eb97.com<br>weekbag.com   |
| 16 | Defendant 32 | sunglasseshut-us.com<br>sunglassesonlinestore-us.com  |
| 17 | Defendant 33 | sweet-bag.com<br>vogue-bags.com   |



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| Defendant 34 | discount-wholesalejewelry.com<br>wholesale-cheapjewelry.com<br>wholesale-cheap-jewelry.com |
| Defendant 35 | chanelhandbagsforcheap.com<br>cocochanelbags.net<br>tiffanyandco-us.net                    |
| Defendant 36 | cheapclothingshop.com<br>cheapshoesclothes.com<br>chinaclothingstore.com                   |
| Defendant 37 | buychanelhandbagsonline.net<br>chanelbags-shop.com<br>chanelbags-shop.net                  |
| Defendant 38 | crazy-trade.com<br>worthtobuy.com  |
| Defendant 39 | asiahongs.com<br>nowmalls.com  |
| Defendant 40 | guccihandbagsnet.com<br>usshoesnet.com   |
| Defendant 41 | linkcl.com<br>linkcl.us<br>outletsky.com<br>shoe-sandals.com                               |
| Defendant 42 | buyluxurynow.com<br>fairoptical.com<br>jewelryshopnow.com                                  |
| Defendant 43 | auchanel.com<br>shoesheelswedges.com<br>bagsarticle.com*                                   |
| Defendant 44 | handbagsdesignercheap.com<br>bags-diary.com*   |
| Defendant 45 | discount-sunglasshut.com<br>mysunglasshut.com  |
| Defendant 46 | brandbagshop.org<br>popularbags.org<br>topbrandbag.net                                     |
| Defendant 47 | chbagshop.com<br>cheapbagsforsale.net<br>cheapchbagsforsale.com<br>newchsale.com           |
| Defendant 48 | ebuysunglasses.com<br>sellsunglass.com   |
| Defendant 49 | chanelsaleonline.com<br>cheapchanelale.com   |

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| Defendant 50 | newfashiontalk.com<br>stylestalks.com  |
| Defendant 51 | cheapsunglassesbrands.com<br>cheapsunglassesmarket.com   |
| Defendant 52 | coachonline-sale.org<br>beautifulboygirl.com*<br>supplier-shops.com*   |
| Defendant 53 | hellorolex.com<br>travelinginfos.com*  |
| Defendant 54 | replica-watches-brands.com<br>watchfordream.net<br>chanelreplicawatches.org*   |
| Defendant 55 | cheap-discount-jordans.com<br>favourite-bags.com<br>nikeairjodanssell.com<br>l-price.com<br>applehot.com*<br>dvdwhole.com* |
| Defendant 56 | chanelbagsusa.com<br>luxurybags123.com*  |
| Defendant 57 | 111mall.com  |
| Defendant 58 | 2011misssupra.com  |
| Defendant 59 | 2011sunglasseshut.com  |
| Defendant 60 | 2buytiffany.com  |
| Defendant 61 | 51will.net   |
| Defendant 62 | 520watches.com   |
| Defendant 63 | 925mall.com  |
| Defendant 64 | aaa-handbag.com  |
| Defendant 65 | a-beststore.com  |
| Defendant 66 | accessorywow.com   |
| Defendant 67 | acheterchanelonline.com  |
| Defendant 68 | agoodbags.info   |
| Defendant 69 | allbazaar.net  |
| Defendant 70 | allbrandoutlet.com   |
| Defendant 71 | asunglassesoutlet.com  |
| Defendant 72 | atwholesalestore.com   |

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|----|---------------|-----------------------------|
| 1  | Defendant 73  | auburnhometownrealty.com    |
| 2  | Defendant 74  | authenticbagsonsale.com     |
| 3  | Defendant 75  | authentic-chanel-outlet.com |
| 4  | Defendant 76  | authentichandbagsshop.com   |
| 5  | Defendant 77  | b2changbagsoutlet.com       |
| 6  | Defendant 78  | bag2u.com                   |
| 7  | Defendant 79  | bagsbestshop.com            |
| 8  | Defendant 80  | bagscoming.com              |
| 9  | Defendant 81  | bags-easy.com               |
| 10 | Defendant 82  | bagsshowtime.com            |
| 11 | Defendant 83  | bagswatchoutlet.com         |
| 12 | Defendant 84  | bagswholesales.com          |
| 13 | Defendant 85  | bagsyard.com                |
| 14 | Defendant 86  | baratoschanel.com           |
| 15 | Defendant 87  | besthandbags-sales.com      |
| 16 | Defendant 88  | best-highheels.com          |
| 17 | Defendant 89  | bestsunglassesoutlet.com    |
| 18 | Defendant 90  | best-watch-shop.com         |
| 19 | Defendant 91  | bigtimesunnies.com          |
| 20 | Defendant 92  | brandbagfactory.com         |
| 21 | Defendant 93  | brandhat.net                |
| 22 | Defendant 94  | brandnewhandbag.com         |
| 23 | Defendant 95  | brandreplicashop.com        |
| 24 | Defendant 96  | brand-sneakers.net          |
| 25 | Defendant 97  | brandstyleline.com          |
| 26 | Defendant 98  | brandsunglassessupplier.com |
| 27 | Defendant 99  | brandwatch8.com             |
| 28 | Defendant 100 | breaksneaker.com            |

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| 1  | Defendant 101 | btobuy.com                                     |
| 2  | Defendant 102 | bulkforu.com                                   |
| 3  | Defendant 103 | buychanelhere.com                              |
| 4  | Defendant 104 | buy-cheap-chanel.com                           |
| 5  | Defendant 105 | buy-jordons.com                                |
| 6  | Defendant 106 | buysunglassesus.com                            |
| 7  | Defendant 107 | buyswissreplicawatches.com                     |
| 8  | Defendant 108 | ca147.com                                      |
| 9  | Defendant 109 | ceramicj12watches.com                          |
| 10 | Defendant 110 | chanel0online.com                              |
| 11 | Defendant 111 | chanelbag-online.com                           |
| 12 | Defendant 112 | chanelbagoutlets.net                           |
| 13 | Defendant 113 | chanelbags2011.com                             |
| 14 | Defendant 114 | chanelbags2012.com<br>chanelbags-2012.com      |
| 15 | Defendant 115 | chanelbags7.com                                |
| 16 | Defendant 116 | chanelbags-online.com                          |
| 17 | Defendant 117 | chanelbagsonlines.com                          |
| 18 | Defendant 118 | chanel-bags-onsale.com                         |
| 19 | Defendant 119 | chanelbagsstores.com                           |
| 20 | Defendant 120 | chanel-bags-uk.co.uk                           |
| 21 | Defendant 121 | chanelbagsus.net<br>cheapchanelbagsforsale.net |
| 22 | Defendant 122 | chanelbagswholesale.com                        |
| 23 | Defendant 123 | chanelby.com                                   |
| 24 | Defendant 124 | chanel-chanel.net                              |
| 25 | Defendant 125 | chanel-handbag.co.uk                           |
| 26 | Defendant 126 | chanelhandbagschina.com                        |
| 27 | Defendant 127 | chanelhandbagsky.com                           |

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| 1  | Defendant 128 | chanelhandbags-outlet.net                        |
| 2  | Defendant 129 | chanel-j12.org                                   |
| 3  | Defendant 130 | chanel-j12-watches.com                           |
| 4  | Defendant 131 | chanelltdonline.com                              |
| 5  | Defendant 132 | chanelonlineshopping.us                          |
| 6  | Defendant 133 | chanelonsales.com                                |
| 7  | Defendant 134 | chanel-outlet2011.com                            |
| 8  | Defendant 135 | chaneloutlet-online.com                          |
| 9  | Defendant 136 | chanelproduct.com                                |
| 10 | Defendant 137 | chanelreplicaoutlet.us<br>chaneloutletforsale.us |
| 11 | Defendant 138 | chanelstore.net                                  |
| 12 | Defendant 139 | channelsunglass2011.com                          |
| 13 | Defendant 140 | channelsunglasses2010.com                        |
| 14 | Defendant 141 | channelsunglassesshop.info                       |
| 15 | Defendant 142 | chaneluksale.com                                 |
| 16 | Defendant 143 | chanelukshop.com<br>chanelukstore.com            |
| 17 | Defendant 144 | chanel-watches.us                                |
| 18 | Defendant 145 | chanelwatches-outlet.com                         |
| 19 | Defendant 146 | charmtide.com                                    |
| 20 | Defendant 147 | cheapbagsonsale.com                              |
| 21 | Defendant 148 | cheapbagsoutlet2011.com                          |
| 22 | Defendant 149 | cheapchanelbagsforsale.com                       |
| 23 | Defendant 150 | cheapchanelbags-outlet.com                       |
| 24 | Defendant 151 | cheapchannelsunglasses.com                       |
| 25 | Defendant 152 | cheapchannelsunglasses.net                       |
| 26 | Defendant 153 | cheap-coachoutlet.com                            |
| 27 | Defendant 154 | cheapdesignersunglassessale.com                  |

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|----|---------------|-----------------------------|
| 1  | Defendant 155 | cheapdesignerwholesale.net  |
| 2  | Defendant 156 | cheaperchinaclothing.com    |
| 3  | Defendant 157 | cheapforsneakers.com        |
| 4  | Defendant 158 | cheaphandbag.biz            |
| 5  | Defendant 159 | cheaphandbags1.com          |
| 6  | Defendant 160 | cheap-handbags-sale.com     |
| 7  | Defendant 161 | cheaphandbagssale.us        |
| 8  | Defendant 162 | cheapoakleysoutlet.net      |
| 9  | Defendant 163 | cheapoakleysunglassesus.com |
| 10 | Defendant 164 | cheapshoes169.com           |
| 11 | Defendant 165 | cheapsunglassesshop.net     |
| 12 | Defendant 166 | cheap-sunglasses-uk.com     |
| 13 | Defendant 167 | cheapsunglassesus.com       |
| 14 | Defendant 168 | cheap-supply.com            |
| 15 | Defendant 169 | cheaptiffanystore.com       |
| 16 | Defendant 170 | cheapwholesalefashion.com   |
| 17 | Defendant 171 | cheapwomens.org             |
| 18 | Defendant 172 | chinabrandonline.com        |
| 19 | Defendant 173 | chinaclothingsale.com       |
| 20 | Defendant 174 | china-export-suppliers.com  |
| 21 | Defendant 175 | china-fad.com               |
| 22 | Defendant 176 | chinafashionjewelry.net     |
| 23 | Defendant 177 | choose-you-like.com         |
| 24 | Defendant 178 | christian-outlet.net        |
| 25 | Defendant 179 | christyshop.com             |
| 26 | Defendant 180 | clyslshoes.com              |
| 27 | Defendant 181 | cnwholesalestore.com        |
| 28 | Defendant 182 | coachbags365.com            |



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|----|---------------|---------------------------------|
| 1  | Defendant 183 | coachhandbagsreplica.com        |
| 2  | Defendant 184 | cocochanelbag.com               |
| 3  | Defendant 185 | coolsunglasses2011.com          |
| 4  | Defendant 186 | coposhoe.com                    |
| 5  | Defendant 187 | copyokay.com                    |
| 6  | Defendant 188 | countyjewelrystore.com          |
| 7  | Defendant 189 | d9go.com                        |
| 8  | Defendant 190 | damnfly.com                     |
| 9  | Defendant 191 | designerbagsfactory.com         |
| 10 | Defendant 192 | designerclothestore.com         |
| 11 | Defendant 193 | designerdiscountbags.com        |
| 12 | Defendant 194 | designer-shoe.org               |
| 13 | Defendant 195 | designersunglasses2011.com      |
| 14 | Defendant 196 | designersunglassestore.com      |
| 15 | Defendant 197 | designsunglass.com              |
| 16 | Defendant 198 | discountchanel-handbags.com     |
| 17 | Defendant 199 | discountchanelshops.com         |
| 18 | Defendant 200 | discountchanelstores.com        |
| 19 | Defendant 201 | discount-sunglasses-on-sale.com |
| 20 | Defendant 202 | discountsunglassesoutlet.net    |
| 21 | Defendant 203 | discountsunglassessale.com      |
| 22 | Defendant 204 | divadollscloset.com             |
| 23 | Defendant 205 | dsqstock.com                    |
| 24 | Defendant 206 | ecboots.com                     |
| 25 | Defendant 207 | echeapclothing.com              |
| 26 | Defendant 208 | egohandbags.com                 |
| 27 | Defendant 209 | eluxbag.com                     |
| 28 | Defendant 210 | emiumiubags.com                 |

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|----|---------------|--|
| 1  | Defendant 211 | enreplica.com                                |
| 2  | Defendant 212 | eralphlauren.com                             |
| 3  | Defendant 213 | erbags.com                                   |
| 4  | Defendant 214 | eshoppinggucci.com                           |
| 5  | Defendant 215 | ewcss.com                                    |
| 6  | Defendant 216 | facevogue.net                                |
| 7  | Defendant 217 | faith-trade.com                              |
| 8  | Defendant 218 | fake-bags.com                                |
| 9  | Defendant 219 | fakechanelbagsshop.us                        |
| 10 | Defendant 220 | fakesunglasseshut.com                        |
| 11 | Defendant 221 | cheapchanelbagss.com<br>fashionchanelbag.com |
| 12 | Defendant 222 | fashionchanelhandbag.com                     |
| 13 | Defendant 223 | fashioncheaphandbag.com                      |
| 14 | Defendant 224 | fashioncheapjewelry.com                      |
| 15 | Defendant 225 | fashionhandbagsplaza.com                     |
| 16 | Defendant 226 | fashionkingdoms.com                          |
| 17 | Defendant 227 | fashion-ol.com                               |
| 18 | Defendant 228 | fashionpeoples.com                           |
| 19 | Defendant 229 | fashionrealbags.com                          |
| 20 | Defendant 230 | fashions4life.com                            |
| 21 | Defendant 231 | firstfashion.biz                             |
| 22 | Defendant 232 | frenchperfumeshop.com                        |
| 23 | Defendant 233 | f-wholesale.com                              |
| 24 | Defendant 234 | generaljewellery.com                         |
| 25 | Defendant 235 | get-bag.com                                  |
| 26 | Defendant 236 | girl-sunglasses.com                          |
| 27 | Defendant 237 | glassescheaponline.com                       |

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|----|---------------|-------------------------|
| 1  | Defendant 238 | globalbuy.org           |
| 2  | Defendant 239 | go2like.com             |
| 3  | Defendant 240 | gogomalls.com           |
| 4  | Defendant 241 | goodcoachbag.com        |
| 5  | Defendant 242 | good-lookingshoes.com   |
| 6  | Defendant 243 | gooodbags.com           |
| 7  | Defendant 244 | groundmart.biz          |
| 8  | Defendant 245 | grunstore.com           |
| 9  | Defendant 246 | guccilvshoes.com        |
| 10 | Defendant 247 | guccipursewallets.com   |
| 11 | Defendant 248 | hahabags.com            |
| 12 | Defendant 249 | hahaclothing.com        |
| 13 | Defendant 250 | handbagcheapshop.com    |
| 14 | Defendant 251 | handbagpops.com         |
| 15 | Defendant 252 | handbags1688.com        |
| 16 | Defendant 253 | handbags4sell.com       |
| 17 | Defendant 254 | handbags-discount.com   |
| 18 | Defendant 255 | handbagshermes.com      |
| 19 | Defendant 256 | handbagstowholesale.com |
| 20 | Defendant 257 | hao1574.com             |
| 21 | Defendant 258 | hatglass.com            |
| 22 | Defendant 259 | hatswarehouse.com       |
| 23 | Defendant 260 | heregogo.com            |
| 24 | Defendant 261 | hermesbagsseller.com    |
| 25 | Defendant 262 | highheels-retail.com    |
| 26 | Defendant 263 | hottrade2008.com        |
| 27 | Defendant 264 | hot-watch-shop.com      |
| 28 | Defendant 265 | infoed.net              |

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|----|---------------|-------------------------------|
| 1  | Defendant 266 | inwholesalestore.com          |
| 2  | Defendant 267 | irdatacorp.com                |
| 3  | Defendant 268 | italiandesigner2u.com         |
| 4  | Defendant 269 | items-trade.com               |
| 5  | Defendant 270 | j12channel.com                |
| 6  | Defendant 271 | jerseysmaker.com              |
| 7  | Defendant 272 | jewelrycollect.com            |
| 8  | Defendant 273 | jewelry-sterling-silver.com   |
| 9  | Defendant 274 | jewelrywholesalejewellery.com |
| 10 | Defendant 275 | joybuyhandbags.com            |
| 11 | Defendant 276 | kaufenchanelonline.com        |
| 12 | Defendant 277 | kisstrend.com                 |
| 13 | Defendant 278 | ladybagonsale.com             |
| 14 | Defendant 279 | ladybagsfactory.com           |
| 15 | Defendant 280 | likebuybags.com               |
| 16 | Defendant 281 | likeswisswatches.com          |
| 17 | Defendant 282 | lokobuy.com                   |
| 18 | Defendant 283 | louboutin-christian.com       |
| 19 | Defendant 284 | louisvuittonhandbags.cc       |
| 20 | Defendant 285 | louisvuitton-lvhandbags.net   |
| 21 | Defendant 286 | louisvuittonpurses2.com       |
| 22 | Defendant 287 | louisvuitton-us.com           |
| 23 | Defendant 288 | lovebagstore.com              |
| 24 | Defendant 289 | luxecheaphandbags.com         |
| 25 | Defendant 290 | luxurybagsupplier.com         |
| 26 | Defendant 291 | luxurychanelgifts.com         |
| 27 | Defendant 292 | luxury-in-china.net           |
| 28 | Defendant 293 | lvbageshop.com                |

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|----|---------------|---|
| 1  | Defendant 294 | lvgoodbag.com   |
| 2  | Defendant 295 | lv-sale.net   |
| 3  | Defendant 296 | mallofbag.com   |
| 4  | Defendant 297 | marcjacobshandbagssale.com                            |
| 5  | Defendant 298 | mychanelkingdom.com                                   |
| 6  | Defendant 299 | myshoesdream.com                                      |
| 7  | Defendant 300 | myskyhandbags.com                                     |
| 8  | Defendant 301 | mysunglasseshut.com                                   |
| 9  | Defendant 302 | mywatch39.com   |
| 10 | Defendant 303 | nethotstore.com                                       |
| 11 | Defendant 304 | newbagscheap.com                                      |
| 12 | Defendant 305 | newfaithtrade.com                                     |
| 13 | Defendant 306 | nextangel.com   |
| 14 | Defendant 307 | niceniceshop.com                                      |
| 15 | Defendant 308 | nicesunglass.com                                      |
| 16 | Defendant 309 | nikeperfect.com                                       |
| 17 | Defendant 310 | novbags.com   |
| 18 | Defendant 311 | oakley2sunglasses.com                                 |
| 19 | Defendant 312 | oakleyssunglasses-hot.com<br>oakleysunglasses-hot.com |
| 20 | Defendant 313 | oakleytopsale.com                                     |
| 21 | Defendant 314 | oksunglassesforcheap.com                              |
| 22 | Defendant 315 | oksunglasseshut.com                                   |
| 23 | Defendant 316 | online-fashiongoods.com                               |
| 24 | Defendant 317 | onlinetradese.com                                     |
| 25 | Defendant 318 | outlet-express.net                                    |
| 26 | Defendant 319 | paypalcoachpurses.com                                 |
| 27 | Defendant 320 | popbrands.net   |

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|----|---------------|---------------------------------|
| 1  | Defendant 321 | purelife-bags.com               |
| 2  | Defendant 322 | purses-chanel.com               |
| 3  | Defendant 323 | relyshops.com                   |
| 4  | Defendant 324 | replicachanel2u.org             |
| 5  | Defendant 325 | replicachanelonline.com         |
| 6  | Defendant 326 | replica-coco-lv.com             |
| 7  | Defendant 327 | replicadesignerhandbagssale.com |
| 8  | Defendant 328 | replica-fake-watches.com        |
| 9  | Defendant 329 | replicahandbagss.org            |
| 10 | Defendant 330 | replicarayban.net               |
| 11 | Defendant 331 | replicas-bags-store.com         |
| 12 | Defendant 332 | replicashandbags.biz            |
| 13 | Defendant 333 | replica-supplier.com            |
| 14 | Defendant 334 | replicas-watches-sell.com       |
| 15 | Defendant 335 | replica-watches-eshop.com       |
| 16 | Defendant 336 | repliwatch.com                  |
| 17 | Defendant 337 | republic-handbags.com           |
| 18 | Defendant 338 | rescuewallet.com                |
| 19 | Defendant 339 | sale66.com                      |
| 20 | Defendant 340 | salehandbagsbags.com            |
| 21 | Defendant 341 | saleraybansunglasses.org        |
| 22 | Defendant 342 | saveintrade.com                 |
| 23 | Defendant 343 | buy4cheaps.fr<br>selfband.com   |
| 24 | Defendant 344 | sellpurse.com                   |
| 25 | Defendant 345 | selsales.com                    |
| 26 | Defendant 346 | shangtrade.com                  |
| 27 | Defendant 347 | sheerbeautybareminerals.com     |

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|----|---------------|-------------------------|
| 1  | Defendant 348 | shoesrunning.com        |
| 2  | Defendant 349 | shopcn.biz              |
| 3  | Defendant 350 | shopingstock.com        |
| 4  | Defendant 351 | storereplica.com        |
| 5  | Defendant 352 | sumbags.com             |
| 6  | Defendant 353 | sunglassesrayban.net    |
| 7  | Defendant 354 | sunglassessaler.com     |
| 8  | Defendant 355 | sunglasses-shoppe.com   |
| 9  | Defendant 356 | sunglassessky.com       |
| 10 | Defendant 357 | sunglasses-sky.com      |
| 11 | Defendant 358 | sunglassko.com          |
| 12 | Defendant 359 | sunglassoutlet.us       |
| 13 | Defendant 360 | supplyshoes.com         |
| 14 | Defendant 361 | swissreplica.co.uk      |
| 15 | Defendant 362 | swissreplicauk.com      |
| 16 | Defendant 363 | thefirstbag.com         |
| 17 | Defendant 364 | thevoguelady.com        |
| 18 | Defendant 365 | tiffanyand-co.com       |
| 19 | Defendant 366 | tiffanyonlineus.net     |
| 20 | Defendant 367 | tiffanyoutletus.com     |
| 21 | Defendant 368 | topbagswell.com         |
| 22 | Defendant 369 | topluxurybagsoutlet.com |
| 23 | Defendant 370 | topreplicaonline.com    |
| 24 | Defendant 371 | topwholesalestore.com   |
| 25 | Defendant 372 | tradingbus.com          |
| 26 | Defendant 373 | usayahooo.com           |
| 27 | Defendant 374 | ushandbagswholesale.com |
| 28 | Defendant 375 | ustoryburchoutlets.com  |

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|----|---------------|--------------------------------|
| 1  | Defendant 376 | voguechanel.com                |
| 2  | Defendant 377 | wal-watch.com                  |
| 3  | Defendant 378 | watcharoo.com                  |
| 4  | Defendant 379 | watches-7.com                  |
| 5  | Defendant 380 | watchsaleshop.com              |
| 6  | Defendant 381 | weekendbuy.com                 |
| 7  | Defendant 382 | wholesalechanelshoes.info      |
| 8  | Defendant 383 | wholesalecheapjewelrychina.com |
| 9  | Defendant 384 | wholesale-coach-bags.com       |
| 10 | Defendant 385 | wholesaledesignerhandbags.us   |
| 11 | Defendant 386 | wholesalejewelry168.com        |
| 12 | Defendant 387 | wholesalejewelrycity.com       |
| 13 | Defendant 388 | wholesalejewelry-fashion.com   |
| 14 | Defendant 389 | wholesalenikeshoes.com         |
| 15 | Defendant 390 | wholesalepursesforcheap.com    |
| 16 | Defendant 391 | winksandco.com                 |
| 17 | Defendant 392 | womensfashionshop.com          |
| 18 | Defendant 393 | worldbrandhandbags.com         |
| 19 | Defendant 394 | xmasgate.com                   |
| 20 | Defendant 395 | yahbags.com                    |
| 21 | Defendant 396 | yearhandbags.com               |
| 22 | Defendant 397 | yourjeansyouchoose.com         |
| 23 | Defendant 398 | yys66.com                      |
| 24 | Defendant 399 | chanel-bags.me                 |

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26 \* - Denotes blog style website.